

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

POWER INVESTMENTS, LLC,)	
)	
Plaintiff/Counterclaim)	
Defendant,)	
vs.)	Case No. 4:21-cv-01022-SEP
)	
CARDINALS PREFERRED, LLC,)	
)	
Defendant/Counterclaim)	
Plaintiff.)	

MOTION FOR CONTINUED SEALING

Plaintiff/Counterclaim Defendant Power Investments, LLC (“**Power**”), by and through counsel, respectfully requests leave to file under seal indefinitely Exhibits 1-4 to its Memorandum in Opposition to Cardinals Preferred, LLC’s (“**Cardinals**”) Motion to Amend Case Management Order (the “**Opposition**”), as well as the portions of the Opposition that specifically refer to the contents of Exhibits 1-4. In support of this motion, Power states as follows:

1. Shortly after this motion, Power will be filing its Opposition.
2. Exhibit 1 to the Opposition is an email chain between Cardinals representatives dated August 12, 2021 (CARD0032866-68), Exhibit 2 is an email chain between Cardinals representatives dated August 12, 2021 (CARD0032964-66), Exhibit 3 is an email chain between Cardinals representatives dated August 12, 2021 (CARD0032967-71), and Exhibit 4 is an email chain between Cardinals representatives dated August 12, 2021 (CARD0032850-53). Each of these documents has been marked “Confidential” by Cardinals, the producing party, under the Stipulated Protective Order (Doc. 43).
3. Though Power disagrees with Cardinals’ designation of these documents as

“Confidential,” Cardinals has nevertheless so designated them, ostensibly on the ground they contain information Cardinals considers to be sensitive or confidential business information.

4. Accordingly, the Stipulated Protective Order requires Power to seek leave of Court to file Exhibits 1-4 under seal. (Doc. 43 ¶ 13.)

5. Accordingly, and pursuant to Local Rule 13.05, the Court’s Protective Order, and the additional reasons set out in the memorandum filed concurrently with this motion, Power requests leave to file the identified documents under seal indefinitely.

WHEREFORE, Power respectfully requests that this Court enter an Order granting leave to file under seal indefinitely Exhibits 1-4 to its Memorandum in Opposition to Cardinals Preferred, LLC’s Motion to Amend Case Management Order, as well as the portions of that Opposition that specifically refer to the contents of Exhibits 1-4, and for such other and further relief as the Court deems just and proper under the circumstances.

Dated: January 26, 2022

ARMSTRONG TEASDALE LLP

By: /s/ Christopher R. LaRose

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CERTIFICATE OF SERVICE

The undersigned certifies that on this 26th day of January, 2022, the foregoing and all attachments were electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of the same to all counsel of record.

/s/ Christopher R. LaRose